

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MICHAEL FOSTER,

Plaintiff,

vs.

KEYSTONE FREIGHT CORP,

Defendant.

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CIVIL ACTION NO. 2:11-cv-02476

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

1. Does anyone know any of the lawyers involved in this case: Andrew La Fiura and James Panzini of Jackson Lewis, and Paul Lantis and Ari Karpf of Karpf, Karpf & Cerutti?

2. Keystone Freight Corp. is an interstate motor carrier, which is a part of National Retail Systems, Inc. Does anyone have any experience with these companies, either as an employee, potential employee or customer?

3. During the trial of this case, the following persons may be called to testify: Michael Foster, William Cluver, Clarence Johnson, Abe Baez, Maria Klimowicz, Dr. Michael Schulman and Dr. Craig Garfield.

a. Do any of you know any of these persons?

b. Do you know anyone who knows any of these persons?

4. Have you or any member of your family ever owned, operated or managed a business that had employees?

5. Have you ever been terminated from a job or found it necessary to terminate an employee or recommend that an employee be terminated?

6. Have you ever been accused of engaging in illegal discrimination? That is, have you ever been accused of sexual, racial, religious, national origin, disability or age discrimination or retaliation by someone else?

7. Have you ever filed or threatened to file a grievance or complaint or lawsuit against anyone because you believed you were discriminated against?

8. Have you ever filed a lawsuit against your employer or a prospective employer?

9. What is your:

- a) Current occupation and employment duties;
- b) Former occupations and employment duties;
- c) Degree of education obtained;
- d) Marital status;
- e) Children;
- f) Spouse's current and former employment; and
- g) Children's current or former employment.

10. Have you or a member of your family ever suffered from end-stage renal failure?

11. Have you or a member of your family ever been the recipient of an organ transplant?

12. Have you or a member of your family worked in or had any training in personnel or human resource matters or employment law?

13. I will instruct you as to just what the applicable law is and how it must be applied to the particular circumstances and claims of this lawsuit. Some of those instructions may concern matters with which you disagree personally, but you do not have the option of rejecting my instructions regarding the law. Would you find it difficult to follow the legal instructions

which I will give to you, even if you might personally disagree as to whether my instruction accurately states the law or whether the law is “fair” or “unfair” in your own personal opinion?

14. Finally, do you, for any reason, whether I mentioned it or not, feel that you could not consider the evidence and arguments presented in a fair and impartial manner and give a fair and impartial hearing to the parties and issue a fair and impartial decision?

Respectfully Submitted,

/s/ James J. Panzini

James J. Panzini

Andrew D. La Fiura

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ATTORNEYS FOR DEFENDANT

Dated: October 24, 2012